

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**IN RE METHYL TERTIARY BUTYL ETHER
PRODUCTS LIABILITY LITIGATION**

This document relates to:

City of New York v. Amerada Hess Corporation, et al.,
No. 04 Civ. 3417 (SAS)

Master File No. 1:00-1898
MDL 1358 (SAS)
M21-88

**DECLARATION OF LAUREN HANDEL IN SUPPORT OF
DEFENDANTS' OPPOSITION TO PLAINTIFF'S MOTION *IN LIMINE* NO. 3
TO EXCLUDE EXPERT TESTIMONY CONSISTING OF LEGAL CONCLUSIONS,
INTERPRETING THE LAW, OR REGARDING LEGISLATIVE OR
AGENCY MOTIVE OR INTENT**

Lauren Handel, an attorney duly admitted to practice law in the State of New York and in this Court, hereby declares under penalty of perjury:

1. I am an attorney with the law firm of McDermott Will & Emery LLP, counsel for the Exxon Mobil Defendants in the above-captioned matter. I submit this Declaration in support of Defendants' Opposition to Plaintiff's Motion *In Limine* No. 3 to Exclude Expert Testimony Consisting of Legal Conclusions, Interpreting the Law, or Regarding Legislative or Agency Motive or Intent (hereinafter "Opposition"). This Declaration authenticates the exhibits attached hereto and relied on in support of the Opposition. In accordance with this Court's Individual Rules and Procedures, the exhibits have been excerpted to include only the relevant material. Copies of each of the exhibits appended hereto were made at my direction on or around May 26, 2009.

2. Attached hereto as Exhibit A is a true and correct copy of excerpts from the Expert Report of Thomas C. Austin.

3. Attached hereto as Exhibit B is a true and correct copy of excerpts from the
Expert Report of Robert N. Stavins.

4. Attached hereto as Exhibit C is a true and correct copy of excerpts from the
Expert Report of Marcia Williams.

5. Attached hereto as Exhibit D is a true and correct copy of excerpts from the
Expert Report of Richard D. Wilson.

Dated: New York, NY
May 26, 2009

Respectfully submitted,

/s/ Lauren Handel
Lauren Handel